



COMMONWEALTH of VIRGINIA

Marissa J. Levine, MD, MPH, FAAFP
State Health Commissioner

Department of Health
P O BOX 2448
RICHMOND, VA 23218
May 10, 2016

TTY 7-1-1 OR
1-800-828-1120

Virginia Department of Environmental Quality
Attn: Bettina Sullivan, Manager
Office of Environmental Impact Review and
Priorities Program
P.O. Box 1105
Richmond, Virginia 23218

Subject: Coastal Management Zone Consultation
Federal Consistency Documentation
City of Alexandria – Robinson Terminal South: FY-2016 Boating
Infrastructure Grant (BIG) Project – Tier II

Dear Bettina Sullivan:

This document provides the Commonwealth of Virginia with the Virginia Department of Health (VDH) Consistency Documentation under the Coastal Zone Management Act §307(c)(1) and 15 CFR 930, Subpart F, for Robinson Terminal South project located on the Potomac River in the City of Alexandria. The project will involve the renovation of an existing fixed concrete "T" wharf and the installation of two floating docks located on the inside of the wharf. The information in this Federal Consistency Documentation is provided pursuant to 15 CFR §930.39. A portion of the Robinson Terminal South project is being funded by the Boating Infrastructure Grant (BIG).

Background:

VDH receives Boating Infrastructure Grants (BIG) to provide funding to Virginia localities and private sector entities for the development and maintenance of boating infrastructure facilities. The Sport Fish and Boating Safety Act of 1998 (Public Law 105-178) established BIG to develop and maintain boating facilities for transient nontrailerable recreational vessels. This particular BIG grant was awarded March 11, 2016. The grant funds will be used to assist RT South Associates-JBG Companies in refurbishing the fixed concrete wharf and installing floating docks. Access to each of the floating docks will be accomplished using ADA ramps. The project objective is to redevelop the Robinson Terminal South site based on the framework set by the City's Waterfront Plan – connecting the public to the water and to Alexandria's history. The project objective is to convert a historic commercial docking facility for recreational use with accommodations for 13 transient vessels plus dockage for water taxis and visiting historic vessels in the heart of Old Town Alexandria.

Based on the proposed scope of work, VDH has determined that the Robinson Terminal South project will have no adverse effect on coastal uses and/or natural resources of Virginia addressed by the nine (9) enforceable policies of the Virginia Coastal Zone Management Program (VCP), as discussed below:

- **Fisheries Management** – Proposed project construction will adhere to strict erosion and sediment control measures to prevent potential negative impacts to fish and other wildlife resources in the Chesapeake Bay. There are no surface features on or adjacent to the project site that support a commercial or recreational fishery; therefore the project will consistent with the fisheries management enforcement policy.
- **Subaqueous Lands Management** – The proposed project will take place on state-owned subaqueous bottom lands. The project will be consistent with the subaqueous lands management enforceable policy.
- **Wetlands Management** – A wetland delineation/determination has not been performed at the subject property; however, according to the USFWS National Wetlands Inventory map accessed at <http://www.fws.gov/wetlands/Data/Mapper.html> and visual observation, there are not suspected to be any wetland areas on the subject property. Therefore, the proposed undertaking is not subject to Executive Order 11990, permitting from the U.S. Army Corps of Engineers nor the State. Based on the lack of on-site wetland areas, the proposed project will not impact wetlands; therefore the project will be consistent with the wetland management enforceable policy.
- **Dunes Management** – There are no dunes of any kind located on or near the project site. The proposed undertaking will not result in the destruction or alteration of any primary dunes. Therefore, the proposed project will be consistent with the dunes management enforceable policy.
- **Non-point Sources Pollution Control** – Virginia's Erosion and Sediment Control Law requires soil-disturbing projects to be designed to reduce soil erosion and to decrease inputs of chemical nutrients and sediments to the Chesapeake Bay, its tributaries, and other rivers and waters of the Commonwealth. The program is administered by the State Air Pollution Control Board (Virginia Code §10.1-560).
- **Point Source Pollution Control** – the project does not require a stormwater permit. Therefore, the proposed project will be consistent with the Point Source Pollution Control enforceable policy.
- **Shoreline Sanitation** – The proposed undertaking does not include installation of septic tanks. Therefore, the proposed project will be consistent with the Shoreline Sanitation enforceable policy.

Bettina Sullivan
May 10, 2016
Page 3

- **Air Pollution Control** – RT South Associates, JBG Companies, and the City of Alexandria will make the appropriate provisions to limit the amount of ozone by not having equipment idle on site and will also limit soil particulates and any dust entry into the air. Use of equipment for installation/renovation would result in minor emissions; however none would violate Federal or Virginia air quality standards. Therefore, the proposed project will be consistent with the Air Pollution Control enforceable policy.
- **Coastal Lands Management** – USFWS approval of the Robinson Terminal South project is contingent on the project's compliance with all applicable Federal, State, and local coastal lands management requirements. Specifically, USFWS requires that the project must comply with the state Chesapeake Bay Preservation Act; the Chesapeake Bay Preservation Area Designation and Management Regulations; and the codes administered by the DEQ's Office of Stormwater Management. Although the subject property maybe located within a Chesapeake Bay Preservation Area (RMA, RPA nor IDA); the project will have no adverse impact to the Chesapeake Bay Preservation Areas. Therefore, the proposed project will be consistent with the Coastal Lands Management enforceable policy.

FEDERAL CONSISTENCY DOCUMENTATION: Based upon the information, data, and analysis presented above, VDH has determined that the proposed project is consistent to the maximum extent practicable with the enforceable policies of the Virginia Coastal Zone Management Program

Please see the attached records that support VDH's Consistency Documentation. The final version of this document, which includes all supporting documentation, will constitute VDH's environmental review of the project, which is required by the National Environmental Policy Act (NEPA).

Please forward response to:

Virginia Department of Health
Attn: Preston Smith, Project Officer
109 Governor Street
5th Floor
Richmond, Virginia 23219
preston.smith@vdh.virginia.gov

Sincerely

A handwritten signature in dark ink, appearing to read "Preston Smith", is written over a light blue horizontal line.

Preston Smith, Marina Programs Manager
BIG Administrator and Project Officer

